

DECLARATION OF PERCY UPSHAW, JR.

Percy Upshaw, Jr., pursuant to 28 U.S.C. § 1746, and subject to the penalties of perjury declares as follows:

1. My name is Percy Upshaw, Jr. I am more than twenty-one years of age, competent to testify, and have no legal or mental disability and have personal knowledge of the facts stated herein. I freely give this declaration for use in this case. This declaration was executed in the state of Georgia, where I am a resident.
2. I lived at the Super Inn located at 301 Fulton Industrial Circle SW, Atlanta, GA for about three months in 2012. After that, I would come back to visit people who lived there or give them rides.
3. When I stayed at the Super Inn, there were girls being sold for sex everywhere. There were girls standing in a crowd in front of the hotel, walking the street, and hanging out the windows of the hotel to yell at and solicit men for sex. There were at least 20 girls at any time being sold for sex at the Super Inn.
4. These girls would be dressed very scantily – in the summertime the girls outside and around the hotel would be almost naked. Girls would wear lingerie throughout the property. A few of these girls looked like they might have been minors.

5. I would try to help girls when I could, usually if a buyer caused a scene. It was pretty common for buyers of sex to be leaving the hotel or walking out of the front office of the hotel yelling back at a girl that they had been robbed or ripped off. I tried to help several girls escape from men at the Super Inn and would give them rides to get away at times.
6. In the winter time, when it was cold, some girls would hang out in the hallway by the front desk, wearing lingerie or something similar and they would wait to see if a car pulled up with a man to buy sex, and if so, they would run outside to talk to that man and try to sell him sex, and then go back to waiting inside for another buyer to come through.
7. Most of the people staying at the Super Inn, I would say 90% of guests, were involved in some kind of criminal activity, mostly prostitution, sex trafficking, or drugs. If the hotel thought a guest was going to call the police, they would not let that person stay at the hotel.
8. More of the sex trafficking and prostitution happened at night at the Super Inn. At night, the hotel locked the front door (which could be seen from the front desk) and every person that came in had to be buzzed in by the front desk employee. So every time a girl and a buyer came in for sex – which happened

about 100 times or more a night – they had to be let in each time by a hotel employee.

9. When I was at the Super Inn, there were a few long-term residents at the hotel who sold drugs and pimped girls and who had been at the Super Inn for a long time and had a lot of street respect from the other residents at the Super Inn. If one of them said you could stay at the Super Inn, then the manager of the hotel would let you rent a room.
10. I have seen people at the Super Inn in shootouts at the hotel, running out of the hotel and shooting at people running down the street. I have also been robbed at the Super Inn myself.
11. I have read this Declaration consisting of 11 numbered paragraphs and I declare under penalty of perjury that it is true and correct.

Executed on November 15, 2022.

DocuSigned by:
Percy Upshaw
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Percy Upshaw